

EXHIBIT C  
TO  
OGLESBY DECL.

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**From:** Oglesby, Matt H (LDZX) [Matt.H.Oglesby@p66.com]  
**Sent:** 7/8/2019 3:58:55 PM  
**To:** Alison Christian [achristian@cdslawfirm.com]  
**CC:** Shelton, Shannon E (LDZX) [Shannon.E.Shelton@p66.com]; Hall, Stephanie Y. (LDZX) [Stephanie.Y.Hall@p66.com]; Oglesby, Matt H (LDZX) [Matt.H.Oglesby@p66.com]  
**Subject:** Major v. P66 - legal fees and costs incurred.  
**Attachments:** Major External Costs To Date\_07.08.19.pdf; Gilmore Invoice\_06.11.19.\_Redacted.pdf; Norton Rose Invoice\_05.17.19\_Redacted.pdf; Norton Rose Invoice\_06.20.19\_Redacted.pdf; Trinity Invoice\_05.29.19\_Redacted.pdf

Alison,

As you may recall, Phillips 66 received reimbursement from National Interstate for fees and costs incurred from the date of tender to your insured – Coastal Transport – through March of 2019. National Interstate has informed Phillips 66 that it has now confirmed that its policies do not cover the time period of Phillips 66's (or its predecessors in interests) ownership of the Phoenix terminal. As such, National Interstate will no longer reimburse Phillips 66 for fees and costs.

The attached spreadsheet contains fees and costs incurred from April 2019 forward. I have attached redacted versions of the invoices from NRF for your review. Redactions were done to removed Phillips 66 internal processes on the invoices. I have also attached invoices for costs incurred for legal services (Trinity) and for costs incurred by a former employee (Gilmore) who was deposed in this matter.

With the exception of the most recent NRF invoice, all invoices have been paid in full. As I explained to you on our last phone call, the costs for defending this matter will continue to escalate as we move through expert discovery. The most recent NRF invoice clearly reflects that trend.

I forwarded the revised demand from Plaintiff's counsel last week. The deadline he placed to act on this demand expires next week. I am available all week if you would like to discuss a potential response.

I look forward to talking to you soon.

Matt

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**Matthew H. Oglesby**  
Senior Counsel, Litigation

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**Phillips 66**

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